

IN THE UNITED STATES FEDERAL DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

JOYCE RENEE KING  
Defendants.

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CR. NO. 2:05-cr-00297- WHA

**MOTION TO RELEASE ON BOND**

COMES, James R. Cooper, Jr. who moves that this Court release the defendant pending sentencing and states in support thereof as follows:

1. Ms. King was originally free on bond pending trial. She did not keep in touch with he pre-trial office, Donnelle Thompson and after a hearing, her bond was revoked. She now is housed in the Autauga County Jail.
2. Ms. King has seen the error of her ways. She has constructed a program when carries a very high degree of compliance with Ms. Thompson's requests.
3. A comprehensive plan to guarantee compliance has already been sent to Ms. Thompson.

Wherefore, the defendant requests the following relief:

1. That a hearing on this motion be set and following that hearing, Ms. King be released on bond pending sentencing September 26, 2006.
2. All other appropriate relief.

RESPECTFULLY SUBMITTED,

S/James R. Cooper, Jr.  
s/James R. Cooper, Jr. (COO021)  
COOPER & COOPER  
Attorney for Defendant  
312 Scott Street

Montgomery, AL 36104  
(334) 262-4887

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 28<sup>th</sup> day of August, 2006, I have served a copy of the foregoing **Motion to Release** upon Ms. Susan Redmond, Asst. U.S. Attorney, P.O. Box 197, Montgomery, Alabama 36101 and all other parties by electronic case filing, by placing a copy of same in the United States Mail properly addressed and postage prepaid.

S/ James R. Cooper, Jr.

cc:

Renee King  
14 Johnson Ave  
Montgomery, Al 36109

Julia Webb  
876 Boat Landing Rd  
Gordon, Al 36343